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U.S. EPA, REGION 5

April 23, 2003

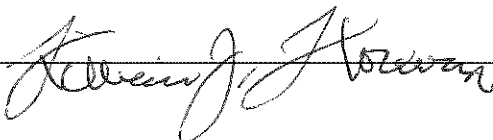
Mr. George Zerniak  
USEPA Region 5  
77 West Jackson Blvd. AE-17J  
Chicago, IL 60604-3507

**RE: Exception Report for NESHAP, Ohio EPA ID P019**

Dear Mr. Zerniak:

Morgan Electro Ceramics 3 month rolling average limit for halogenated solvent usage in degreasing operations is 30.6 lb/month/sq ft surface area. Ohio EPA ID# P019, a degreaser using perchloroethylene has exceeded this limit with 41.2 lb/month/sq ft surface area for the period of 01/01/2003 to 03/30/2003. The inherent reason for the exception was due to an overestimation of volume added and the unit developing a seal leak in the heating section. The overestimation of volume added is produced when the operator responsible for filling the unit, makes conservative assessments of volume added. To correct this, a mechanical flowmeter is being investigated to ensure accurate dispensing volumes. The seal leak in the heating section of the unit was corrected when the unit was tore down and gaskets were replaced. If you have any further questions, please contact me at (440) 232-8600.

Sincerely,



William J. Hocevar, P.E.  
Facility Manager

Facility Name:	<i>Morgan Electro Ceramics</i>	EPA Facility ID:	<i>1318031627</i>
Unit Name:	<i>Finishing Equipment 6342</i>		
Company I.D.:	<i>VPD-24</i>	Ohio EPA I.D.:	<i>P019</i>

Month:	<i>January</i>	Year:	<i>2003</i>
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### Unit Information

Tank Length (inside):	<i>2.92</i>	(feet)
Tank Width (inside):	<i>1.50</i>	(feet)
Tank Surface Area (s.a.):	<i>4.38</i>	(feet) <sup>2</sup>

Solvent Usage Information				Formulas / Notes
1	Type Solvent Used	<i>Perchloroethylene</i>		
2	S.G. of Solvent	<i>1.62</i>		[From MSDS]
3	Solvent Density	<i>13.51</i>	(lb/gallon)	[From MSDS]
4	Solvent Added	<i>34.0</i>	(gallon)	[From monthly log]
5	Waste Removed	<i>34.0</i>	(gallon)	[From monthly log]
6	% Solvent in waste	<i>99.90%</i>	( % )	[From analytical report]
7	Solvent Removed in waste	<i>34.0</i>	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	<i>0.0</i>	(gallon)	[From monthly log]
9	Total Solvent Removed	<i>34.0</i>	(gallon)	[ 7 + 8 ]
10	Total Solvent Emitted	<i>0.0</i>	(gallon)	[ 4 + 9 ]
11	Total Solvent Emitted	<i>0.5</i>	(lbs)	[ 10 * 3 ]
<b>Monthly Emissions</b>				
Average Solvent Emission Rate:		<i>0.1</i>	(lb/month/ft <sup>2</sup> s.a.)	[ 11 / (tank surface area) ]
Average Solvent Allowable Rate:		<i>30.6</i>	(lb/month/ft <sup>2</sup> s.a.)	From 40 CFR 63 , Subpart T
<p><b>Note:</b> If ave. solvent emission rate is &lt; 30.6 lb/month/ft<sup>2</sup>, NO action is required.</p> <p>If ave. solvent emission rate is &gt; 30.6 lb/month/ft<sup>2</sup>, Note in quarterly exceedance report.</p>				
<b>Three Month Rolling Average</b>				
3 - Month Average Solvent Emission Rate:		<i>0.1</i>	(lb/month/ft <sup>2</sup> s.a.)	[ Average of three previous months solvent emission rates

Facility Name:	<i>Morgan Electro Ceramics</i>	EPA Facility ID:	<i>1318031627</i>
Unit Name:	<i>Finishing Equipment 6342</i>	Ohio EPA I.D.:	<i>P019</i>
Company I.D.:	<i>VPD-24</i>		

Month:	<i>February</i>	Year:	<i>2003</i>
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#### Unit Information

Tank Length (inside):	<i>2.92</i>	(feet)
Tank Width (inside):	<i>1.50</i>	(feet)
Tank Surface Area (s.a.):	<i>4.38</i>	(feet) <sup>2</sup>

Solvent Usage Information			Formulas / Notes
1	Type Solvent Used	<i>Perchloroethylene</i>	
2	S.G. of Solvent	<i>1.62</i>	[From MSDS]
3	Solvent Density	<i>13.51</i> (lb/gallon)	[From MSDS]
4	Solvent Added	<i>0.0</i> (gallon)	[From monthly log]
5	Waste Removed	<i>0.0</i> (gallon)	[From monthly log]
6	% Solvent in waste	<i>99.90%</i> ( % )	[From analytical report]
7	Solvent Removed in waste	<i>0.0</i> (gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	<i>0.0</i> (gallon)	[From monthly log]
9	Total Solvent Removed	<i>0.0</i> (gallon)	[ 7 + 8 ]
10	Total Solvent Emitted	<i>0.0</i> (gallon)	[ 4 + 9 ]
11	Total Solvent Emitted	<i>0.0</i> (lbs)	[ 10 * 3 ]
<b>Monthly Emissions</b>			
Average Solvent Emission Rate:		<i>0.0</i> (lb/month/ft <sup>2</sup> s.a.)	[ 11 / (tank surface area) ]
Average Solvent Allowable Rate:		<i>30.6</i> (lb/month/ft <sup>2</sup> s.a.)	From 40 CFR 63, Subpart T
<p><b>Note:</b> If ave. solvent emission rate is &lt; 30.6 lb/month/ft<sup>2</sup>, NO action is required.</p> <p>If ave. solvent emission rate is &gt; 30.6 lb/month/ft<sup>2</sup>, Note in quarterly exceedance report.</p>			
<b>Three Month Rolling Average</b>			
3 - Month Average Solvent Emission Rate:		<i>0.1</i> (lb/month/ft <sup>2</sup> s.a.)	[ Average of three previous months solvent emission rates

Facility Name:	<i>Morgan Electro Ceramics</i>	EPA Facility ID:	<i>1318031627</i>
Unit Name:	<i>Finishing Equipment 6342</i>	Ohio EPA I.D.:	<i>P019</i>
Company I.D.:	<i>VPD-24</i>		
Month:	<i>March</i>	Year:	<i>2003</i>

#### Unit Information

Tank Length (inside):	<i>2.92</i>	(feet)
Tank Width (inside):	<i>1.50</i>	(feet)
Tank Surface Area (s.a.):	<i>4.38</i>	(feet) <sup>2</sup>

Solvent Usage Information				Formulas / Notes
1	Type Solvent Used	<i>Perchloroethylene</i>		
2	S.G. of Solvent	<i>1.62</i>		[From MSDS]
3	Solvent Density	<i>13.51</i>	(lb/gallon)	[From MSDS]
4	Solvent Added	<i>40.0</i>	(gallon)	[From monthly log]
5	Waste Removed	<i>0.0</i>	(gallon)	[From monthly log]
6	% Solvent in waste	<i>99.90%</i>	( % )	[From analytical report]
7	Solvent Removed in waste	<i>0.0</i>	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	<i>0.0</i>	(gallon)	[From monthly log]
9	Total Solvent Removed	<i>0.0</i>	(gallon)	[ 7 + 8 ]
10	Total Solvent Emitted	<i>40.0</i>	(gallon)	[ 4 + 9 ]
11	Total Solvent Emitted	<i>540.4</i>	(lbs)	[ 10 * 3 ]
<b>Monthly Emissions</b>				
Average Solvent Emission Rate:		<i>123.4</i>	(lb/month/ft <sup>2</sup> s.a.)	[ 11 / (tank surface area) ]
Average Solvent Allowable Rate:		<i>30.6</i>	(lb/month/ft <sup>2</sup> s.a.)	From 40 CFR 63 , Subpart T
<p><b>Note:</b> If ave. solvent emission rate is &lt; 30.6 lb/month/ft<sup>2</sup>, NO action is required.</p> <p>If ave. solvent emission rate is &gt; 30.6 lb/month/ft<sup>2</sup>, Note in quarterly exceedance report.</p>				
<b>Three Month Rolling Average</b>				
3 - Month Average Solvent Emission Rate:		<i>41.2</i>	(lb/month/ft <sup>2</sup> s.a.)	[ Average of three previous months solvent emission rates